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REC. 2/11/03

February 7, 2003

Mr. Nabil S. Fayoumi  
U. S. EPA - Region 5  
77 West Jackson Boulevard (SR-6J)  
Chicago, Illinois 60604-3590

**Re: Sauget Area 2 Site – October 3, 2002 Unilateral Administrative Order (UAO)  
Groundwater Operable Unit  
# 3 - February 2003 Monthly Report**

Dear Mr. Fayoumi,

Attached is the February 2003 Monthly Report for the Sauget Area 2 Site October 3, 2002 Unilateral Administrative Order (UAO) - Groundwater Operable Unit. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section XII, paragraph 62, Progress Reports.

Sincerely,  
Solutia Inc.

Steven D. Smith  
Project Coordinator

cc: Ken Bardo - USEPA  
Sandra Bron - IEPA  
Linda Tape - Husch & Eppenberger  
Mayor D. Reed - Cahokia  
Village of Sauget – c/o P. H. Weis & Associates (Attn: Brian Nelson)  
Mayor P. Sauget - Sauget, IL  
Richard Williams - Solutia

## **Sauget Area 2 Site - Sauget, Illinois**

### **October 3, 2002 UAO – Groundwater Operable Unit**

#### **Monthly Report**

**Date of Report:** February 7, 2003  
**Period Covered:** January 1, 2003 - January 31, 2003  
**Next Report Period:** February 1, 2003 - February 28, 2003

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#### **Background**

A Unilateral Administrative Order (UAO) was issued to a number of Potentially Responsible Parties, including Solutia, by the U. S. EPA on October 3, 2002, requiring installation of a 3,500 foot long, "U"-shaped, fully penetrating, jet grout barrier wall to be installed between the downgradient boundary of Sauget Area 2 Site R and the Mississippi River. The wall will be placed to abate the release of impacted groundwater to the river. The UAO (U.S. EPA Docket No. V-W-'02-C-716) also requires installation of three partially penetrating groundwater recovery wells to be installed inside the "U"-shaped barrier wall. The recovery wells will be used to control groundwater moving to the wall. Extracted groundwater will be treated and ultimately discharged to the Mississippi River in compliance with all applicable or relevant and appropriate requirements. Groundwater quality, groundwater level, sediment and surface water monitoring will be used to ensure acceptable performance of the interim groundwater remedy. The work required by the UAO is an interim remedy for the Groundwater Operable Unit at the Sauget Area 2 Site. The remedy was specified in a Record of decision issued on September 30, 2002.

The UAO became effective on November 15, 2002. By letter dated November 15, 2002, Solutia informed the U. S. EPA of its intention to comply with the terms of the UAO.

#### **Agency Actions / Communications**

- The RD/RA Work Plan submitted on December 19, 2002, is under review by the Agency.

#### **Work Performed during the reporting period**

- Volume 1 of the Pre-Final (95%) Remedial Design was submitted to the Agency on January 21, 2003. The rest of the design package (Volumes 2, 3, and 4) was submitted on January 30, 2003.

- A request for an extension of the deadline for obtaining access agreements with all property owners affected by the construction of the Interim Remedial Action was submitted to the USEPA on January 10, 2003. The request was granted on January 28, 2003, extending the due date to March 14, 2003.
- A report on the evaluation of alternatives for the management of spoils generated by the construction of the Interim Remedial Action was submitted to the Agencies on January 20, 2003.
- A permit application for the temporary discharge of treated groundwater from a pilot treatability test to be performed at Site R was submitted to the American Bottoms Regional Wastewater Treatment Facility on January 27, 2003 and to the IEPA on January 28, 2003. An application for the groundwater discharge from the permanent system was also submitted to the IEPA on January 28, 2003.

### **Data Submittal**

No data are submitted with this report.

### **Work scheduled for next reporting period**

- Submission of a status report on access and access agreements.

### **Problems and Solutions**

None

### **Submittal Schedule Status**

See attached UAO schedule

### **Issues under review**

None

### **Comments**

None

## Sauget Area 2 Site - Sauget, Illinois

### October 3, 2002 UAO – Groundwater Operable Unit

#### SCHEDULE

<b>Deliverable</b>	<b>Description</b>	<b>Due Date</b>
Effective Date		<b>15-Nov-02</b>
Notice of Intent to Comply	On or before effective date	<b>15-Nov-02</b>
Designation of Project Coordinator and Contractors	15 days after effective date	<b>30-Nov-02</b>
Access	60 days after effective date	<b>14-Jan-03</b>
Notice of land ownership to appropriate governmental office	5 days after effective date	<b>20-Nov-02</b>
Notice of land ownership recording and indexing to U.S. EPA	15 days after effective date	<b>30-Nov-02</b>
RD/RA Workplan	45 days after effective date	<b>30-Dec-02</b>
Assurance of ability to complete work	30 days after effective date	<b>15-Dec-02</b>
Monthly Reports	To be submitted on or before the 10 <sup>th</sup> date of each month following the effective date of the UAO	<b>10-Dec-02</b>
Construction Completion Report	Within 30 days of a successful final inspection	<b>TBD</b>